

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	:	
	:	<b>Case No.: 18-13261</b>
<b>Walter Johnson</b>	:	<b>Chapter 13</b>
<b>Yvette D. Johnson</b>	:	<b>Judge Ashely M. Chan</b>
<b>Debtor(s)</b>	:	<b>*****</b>
	:	
<b>Wells Fargo Bank, NA</b>	:	
	:	
	:	<b>Place of Hearing</b>
<b>vs</b>	:	<b>U.S. Bankruptcy Court</b>
	:	<b>900 Market Street, Courtroom #4</b>
<b>Walter Johnson</b>	:	<b>Philadelphia, PA, 19107</b>
<b>Yvette D. Johnson</b>	:	
	:	
<b>William C. Miller</b>	:	
	:	
<b>Respondents.</b>	:	

## CERTIFICATE OF DEFAULT

Now comes Wells Fargo Bank, NA, its successor and assigns (hereinafter, "Creditor") by and through counsel, and certifies to this Court that Walter Johnson and Yvette D. Johnson ("Debtors") have failed to comply with the Order approving the stipulation dated November 7, 2019, a copy of which is attached hereto as Exhibit "A", by failing to make timely payments in accordance with the stipulation. Pursuant to the Order, the automatic stay will terminate upon the filing of a Certificate of Default.

Creditor hereby avers that Debtors are delinquent for the December, 2019 payments and for all arrears that were due thereafter. Further, pursuant to the terms of the stipulation, Creditor provided Debtors and their Counsel with a Notice of Default on February 25, 2020, allowing Debtors ten (10) days to cure the default. A copy of said default letter is attached hereto as Exhibit "B". Ten (10) days have passed and the default has not been cured.

WHEREFORE, upon the filing of this Certificate of Default, Creditor requests that the Court enter an order terminating the automatic stay.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

P.O. Box 165028

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Attorneys for Creditor

The case attorney for this file is Karina Velter.

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	:	
<b>Wells Fargo Bank, NA</b>	:	
	:	<b>Movant, Place of Hearing</b>
<b>vs</b>	:	<b>U.S. Bankruptcy Court</b>
	:	<b>900 Market Street, Courtroom #4</b>
<b>Walter Johnson</b>	:	<b>Philadelphia, PA, 19107</b>
<b>Yvette D. Johnson</b>	:	
	:	
<b>William C. Miller</b>	:	
	:	<b>Respondents.</b>
	:	

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Certificate of Default was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

William C. Miller, Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105

Brad J. Sadek, Attorney for Walter Johnson and Yvette D. Johnson, Sadek and Cooper, 1315 Walnut Street, Suite 502, Philadelphia, PA 19107, brad@sadeklaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on March 19, 2020:

Walter Johnson and Yvette D. Johnson, 2524 N. 29th Street, Philadelphia, PA 19132

Walter Johnson and Yvette D. Johnson, 2524 North 29th Street, Philadelphia, PA 19132

DATE: March 19, 2020

/s/ Karina Velter  
Karina Velter, Esquire (94781)  
Adam B. Hall (323867)  
Sarah E. Barngrover (323972)  
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Attorneys for Creditor  
The case attorney for this file is Karina  
Velter.  
Contact email is [kvelter@manleydeas.com](mailto:kvelter@manleydeas.com)